

BRADLEY J. NASH (*admitted pro hac vice*)
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Roots Ready Made Garments Co. W.L.L.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ROOTS READY MADE GARMENTS CO.
W.L.L.,

Plaintiff,

v.

THE GAP, INC., a/k/a, GAP, INC., GAP
INTERNATIONAL SALES, INC., BANANA
REPUBLIC, LLC, AND OLD NAVY, LLC,

Defendants.

Case No: C 07 3363 CRB

**DECLARATION OF BRADLEY J. NASH
IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT,
OR IN THE ALTERNATIVE, SUMMARY
ADJUDICATION**

PUBLIC VERSION

Bradley J. Nash declares the following under penalty of perjury:

1. I am an attorney admitted to appear before this Court *pro hac vice* in this action and am counsel to Roots Ready Made Garments Co. W.L.L. ("Roots").

2. I make this declaration in support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment, or, in the Alternative, Summary Adjudication, to place before the Court certain documents that are referred to in Roots' Opposition Brief.

3. I attach as **Exhibit A** true and correct copies of excerpts from the deposition transcript of Ron Young.

1 4. I attach as **Exhibit B** true and correct copies of selected pages of the deposition
2 transcript of Jon Ehlen.

3 5. I attach as **Exhibit C** true and correct copies of selected pages of the deposition
4 transcript of Jacque Fabre.

5 6. I attach as **Exhibit D** true and correct copies of selected pages of the deposition
6 transcript of Jim Bell.

7 7. I attach as **Exhibit E** true and correct copies of selected pages of the deposition
8 transcript of Ashraf Abu Issa.

9 8. I attach as **Exhibit F** true and correct copies of selected pages of the deposition
10 transcript of Sheikh Faisal Ahmed Al-Thani.

11 9. I attach as **Exhibit G** a true and correct copy of a document, dated May 14, 2003,
12 reflecting a wire transfer in the amount of \$999,982.00 from Roots to Gabana.

13 10. I attach as **Exhibit H** a true and correct copy of a document, dated May 14, 2003,
14 reflecting a wire transfer in the amount of \$1,000,000.00 from Gabana Gulf Distribution Ltd. to
15 Gap Inc., dated May 14, 2003.

16 11. I attach as **Exhibit I** a true and correct copy of an email dated March 20, 2003
17 from Jim Bell to Francois Larsen and others, Bates stamped GAB_0048938-9.

18 12. I attach as **Exhibit J** a true and correct copy of a letter of credit issued in favor of
19 Gabana Gulf Distribution Ltd. on June 18, 2003.

20 13. I attach as **Exhibit K** a true and correct copy of a letter of credit issued in favor
21 of Gap Inc. on June 19, 2003.

22 14. I attach as **Exhibit L** a true and correct copy of a chart produced by Gap titled
23 "Middle East Excess Opportunities," Bates stamped GGD_0009116.

24 15. I attach as **Exhibit M** an email dated October 10, 2003 from Jim Bell to Naser
25 Beheiry, Bates stamped RRMG00008756.

24. I attach as **Exhibit V** true and correct copies of selected pages of the deposition transcript of Ashraf Abu Issa in: Gabana Gulf Distribution, Ltd. v. Gap International Sales, Case No. C 06 2584.

Executed this 8th day of August 2008 in New York, New York.

Bradley J. Nash

-3-